

March 23, 2020

Mr. Christopher Krebs, Director  
Cybersecurity and Infrastructure Security Agency  
U.S. Department of Homeland Security  
Washington, D.C. 20528

RE: Comments on Cybersecurity and Infrastructure Agency's *Guidance on the Essential Critical Infrastructure Workforce: Ensuring Community and National Resilience in COVID-19 Response*

Dear Mr. Krebs:

Insulation manufacturers, distributors, fabricators and installers in the United States submit these comments supporting the designation of our industry as an essential critical manufacturing and public works workforce under the Cybersecurity and Infrastructure Agency's *Guidance on the Essential Critical Infrastructure Workforce: Ensuring Community and National Resilience in COVID-19 Response*. Specifically, we recommend the following modifications (**highlighted**) to the current *Guidance*:

#### Public Works

- Workers who support the operation, inspection, and maintenance of essential dams, locks and levees
- Workers who support the operation, inspection, and maintenance of essential public works facilities and operations, including bridges, water and sewer main breaks, fleet maintenance personnel, construction of critical or strategic infrastructure, traffic signal maintenance, emergency location services for buried utilities, maintenance of digital systems infrastructure supporting public works operations, and other emergent issues
- Workers such as **builders, contractors (i.e. insulation and roofing)**, plumbers, electricians, exterminators, **workers in the building material supply chain**, and other service providers who provide services that are necessary to maintaining the safety, sanitation, and essential operation of residences, **buildings and industrial facilities**
- Support, such as road and line clearing, to ensure the availability of needed facilities, transportation, energy and communications
- Support to ensure the effective removal, storage, and disposal of residential and commercial solid waste and hazardous waste

#### Critical Manufacturing

- Workers necessary for the manufacturing of materials and products needed for medical supply chains, **construction**, transportation, energy, communications, food and agriculture, chemical manufacturing, nuclear facilities, the operation of dams, water and wastewater treatment, emergency services, and the defense industrial base, **and workers necessary to maintain the supply chains serving these sectors**

The use of insulation in U.S. homes and businesses promotes public health and comfort, delivers energy savings for the life of the building and enhances that building's resilience in the face of natural disasters. The manufacture, distribution and installation of insulation generates more than

550,000 jobs in the U.S. and collectively supports a \$33 billion payroll. The manufacture and sale of insulation is a domestic industry – insulation products are manufactured in 45 states and sold in the U.S. for use in residential, commercial and industrial construction.

**Insulation is a key component to all building construction types.** All building types (single family, multi-family, low- and high-rise commercial and industrial facilities) are required by building codes or other regulatory requirements to be well insulated. In homes, offices, and places of business, insulation provides occupant comfort and minimizes heating and cooling costs. During natural disasters, a well-insulated structure allows for occupants to shelter in place for extended periods without power. In industrial facilities, insulation delivers energy efficiency, reduces emissions and ensures safe workplace.

Even a temporary shut down in the capability of the industry to manufacture and install insulation will result in work stoppages at construction sites (with attendant increased risk to public safety) and prevent important maintenance activities at industrial locations. Designating the insulation industry as essential under this *Guidance* is consistent with the federal government’s stated purpose of ensuring “the continuity of functions critical to public health and safety.”

**Insulation manufacturing plants are not designed to respond to rapid shut down/start up orders.** While there are many different types of insulation products and the manufacturing process for each varies, in many instances these are facilities that operate around the clock and are difficult to ramp off and on with short notice. For example, fiber glass insulation is manufactured by melting glass and other materials in furnaces under extremely high heat. Periodic shutdowns for furnace rebuilds are typically scheduled months in advance, involve third-party expert consultants to carry out, and follow a process that safely takes the furnace off-line over several days. Restarting these furnaces can take from a few months to many months depending on the conditions under which they were taken off-line.

Other products like foam insulation are manufactured in facilities that maintain large quantities of raw materials and chemicals onsite. These storage tanks must be monitored and maintained, and in many cases need to be continuously operated outside of scheduled plant maintenance shutdowns. The same considerations are true for the large raw materials suppliers that depend on continuous demand for their products. Shutdowns at large chemical manufacturing facilities are typically scheduled months in advance. The continued operation of these facilities under the protocols described below is the best way to ensure worker and community safety.

**Insulation Manufacturers have protocols in place to protect worker safety.** Insulation manufacturers have an exemplary record of placing worker safety as the first priority in facility operations. In order to maintain safe workplaces, insulation manufacturers restrict public access to their plants. Plants are typically highly automated, which means relatively few workers are located on site and they are able to safely operate with social distancing protocols in place. Manufacturers have responded to the current public health threat by following the CDC guidance for employers to protect workers and prevent the spread of the virus. They have introduced additional worker safety measures that include changes to scheduling, increased cleaning, protective gear requirements and liberal sick leave.

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**Installation contractors have protocols in place to protect worker safety.** Insulation contractors work closely to coordinate with builders, facility owners, general and mechanical contractors to ensure that the scheduling of construction activities such as framing, electrical, plumbing, heating and cooling, welding, insulation and dry-walling are properly sequenced. During this period where additional social distancing is required, the sequencing of trades can be easily adjusted to limit the number of workers present at the worksite. Insulation installers typically work at a project site alone or in teams of two. Again, this work practice can easily incorporate social distancing best practices.

Insulation installers typically wear personal protective gear at the work site. This includes gloves, protective clothing, eyeglasses, and dust masks or full-face respirators.

**Insulation is an essential component of the residential, commercial building and industrial construction industries.** Shortages of insulation materials or unnecessary obstacles preventing workers from making and installing the insulation will delay construction activities and the *COVID-19 Pandemic* recovery efforts.

For the reasons stated above, we ask that CISA's Essential Critical Infrastructure Workers Guidance be modified to specifically recognize that insulation industry manufacturers and installers are deemed essential as part of this nation's critical manufacturing and public works infrastructure.

Sincerely,

Curt Rich  
President and CEO  
North American Insulation Manufacturers  
Association

Justin Koscher  
President  
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Stephen Wieroniey  
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